

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

PREPARED FOOD PHOTOS, INC., f/k/a ADLIFE  
MARKETING & COMMUNICATIONS CO., INC.,

Plaintiff,

$$V_{\bullet}$$

No. 6:24-cv-00351-RRS-DGA

CLYDE'S CHICKEN KING, INC. d/b/a  
CHICKEN KING,

Defendant.

**DEFENDANT’S MOTION TO DISMISS OR,  
IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

Pursuant to Rules 12(b)(6) and 56 of the Federal Rules of Civil Procedure, and for the reasons explained in the accompanying memorandum of law, defendant Clyde's Chicken King, Inc., d/b/a Chicken King, moves the court to dismiss this action with prejudice as untimely. In support of summary judgment, defendant is filing the accompanying Statement of Material Facts and Affirmations of Stacy Deville Boudreaux and Paul Alan Levy, and their exhibits.

Respectfully submitted,

/s/ Paul Alan Levy

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Paul Alan Levy (pro hac vice to be sought)

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/s/ Heather Cross

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April 12, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on **April 12, 2024** a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Heather A. Cross

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HEATHER A. CROSS